

STATE OF MINNESOTA

DISTRICT COURT

COUNTY OF HENNEPIN

FOURTH JUDICIAL DISTRICT

Case Type: Personal Injury

Kristin Pett,

Court File No: _____

Judge: _____

Plaintiff,

VS:

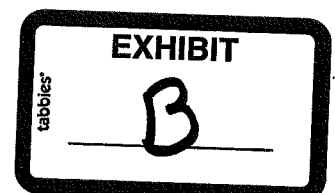
COMPLAINT

Costco Wholesale Corporation,

Defendant.

Plaintiff Kristin Pett, for her Complaint against Defendant Costco Wholesale Corporation, states and alleges as follows:

1. On May 22, 2016, Plaintiff was shopping in the Costco store located at 12011 Technology Drive, Eden Prairie, Minnesota.
2. Defendant Costco Wholesale Corporation does business in Minnesota and has its registered office address located at 1010 Dale Street North, St. Paul, Minnesota 55117.
3. Defendant Costco was negligent in the maintenance of the store allowing water to collect on the floor near the plant section where Plaintiff was shopping. Defendant failed to maintain the area, or provide adequate warning of the hazard.
4. That as a direct result of Defendant's negligence, Plaintiff has sustained permanent injuries; she has in the past and will in the future incur medical expenses to treat the injuries sustained; she has in the past and will in the future incur wage loss and diminution of earning capacity; she has in the past and will in the future experience pain, disability, embarrassment, and emotional distress.



WHEREFORE, Plaintiff Kristin Pett prays for relief as follows: ..

1. For damages in an amount in excess of \$50,000.00;
2. For costs, disbursements and prejudgment interest; and
3. For such other relief as the Court deems appropriate.

TEWKSBURY & KERFELD, P.A.

Dated: December 18, 2017

By 

Michael D. Tewksbury (#108832)

Kyle S. Willems (#0395742)

Attorneys for Plaintiff

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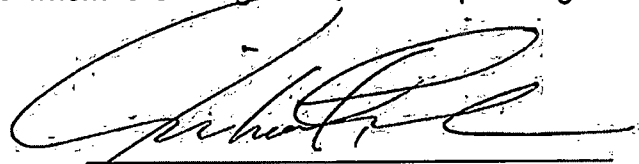
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ACKNOWLEDGMENT

The undersigned hereby acknowledges that costs, disbursements and reasonable attorney and witness fees may be awarded pursuant to Minn. Stat. §549.211, subd.2, to the party against whom the allegations in this pleading are asserted.


Michael D. Tewksbury (#108832)